

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118

1050 K STREET NW | SUITE 1040
WASHINGTON, DC 20001

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0883

DIRECT EMAIL rkaplan@kaplanhecker.com

April 30, 2023

VIA ECF

The Honorable Lewis A. Kaplan
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Carroll v. Trump*, 22 Civ. 10016 (LAK)

Dear Judge Kaplan:

We write on behalf of Plaintiff E. Jean Carroll pursuant to Your Honor's Individual Rules of Practice to seek approval to file under seal a motion and related papers.

On the morning of Thursday, April 27, 2023, the Court held a brief proceeding under seal concerning an issue that had arisen during trial. During that proceeding, the Court invited further briefing. Plaintiff now files such briefing and corresponding papers, and respectfully requests leave to file them under seal given the nature of the issue. Plaintiff further respectfully requests that any subsequent filings and hearings relating to Plaintiff's motion be under seal as well.

Respectfully submitted,



Roberta A. Kaplan

cc: Counsel of Record